

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, individually, and on behalf of all
others similarly situated, JANE DOE 2, individually,
and on behalf of all others similarly situated, JANE
DOE 3, individually, and on behalf of all others
similarly situated, JANE DOE 4, individually, and
on behalf of all others similarly situated, JANE DOE
5, individually, and on behalf of all others similarly
situated, and JANE DOE 6, individually, and on
behalf of all others similarly situated,

Plaintiffs,

v.

GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS, FIRST LADY CECILE DE
JONGH, GOVERNOR KENNETH MAPP,
SENATOR CELESTINO WHITE, ATTORNEY
GENERAL VINCENT FRAZER, GOVERNOR
JOHN DE JONGH, SENATOR CARLTON DOWE,
DELEGATE STACEY PLASKETT, and JOHN
DOES 1-100,

Defendants.

CIVIL ACTION NO.
1:23-cv-10301-AS

NOTICE OF MOTION BY DEFENDANT STACEY PLASKETT

PLEASE TAKE NOTICE that on a date and time set at the convenience of the Court, Defendant Stacey Plaksett will move before the Honorable Arun Submaranian, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for an awarding sanctions against counsel for Plaintiffs Jane Does 1, 2, 3, 4, 5, and 6 under Federal Rule of Civil Procedure 11. Defendant Stacey Plaskett will rely on the accompanying memorandum of law, the Declaration of Stacey Plaskett, and the Declaration of Eric R. Breslin.

Dated: July 2, 2024

DUANE MORRIS LLP

/s/ *Eric R. Breslin*

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